

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIVINGSTON WALKER and LINDA WALKER, 07 CV 7089

Plaintiffs,

RULE 26 DISCLOSURE

-against-

Hon. Peter K. Leisure

LC MAIN, LLC, ROGER & SONS CONCRETE,
INC. and "JOHN DOE" (name is fictitious
and intended to be an employee of ROGER
& SONS CONCRETE, INC.)

Defendants.

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Plaintiffs, LIVINGSTON WALKER and LINDA WALKER, by their
attorneys Bailly and McMillan, LLP, make these initial disclosures
as required by the Federal Rules of Civil Procedure 26(a)(1) and
(2):

A. PERSONS WITH KNOWLEDGE OF RELEVANT FACTS:

The following are individuals likely to have discoverable
information of relevant facts concerning the liability and damages
in this action:

1. Livingston Walker;
2. Linda Walker;
3. Gladys Cardenas, M.D.;
4. East Coast Pain Management;
5. Rye Radiology Associates, LLP;
6. Westchester Medical Center; and
7. "JOHN DOE" (an employee of Defendant ROGER & SONS
CONCRETE, INC. who was operating the concrete buggy

which struck Plaintiff).

B. RELEVANT DOCUMENTS AND TANGIBLE ITEMS:

1. Photographs of the accident site, the concrete buggy that struck Plaintiff and photographs of Plaintiff's injuries are annexed hereto.
2. Records from RS Medical are annexed hereto.
3. Medical records, prescriptions and an authorization for Gladys E. Cardenas, M.D. and East Coast Pain Management, P.C. are annexed hereto.
4. Medical records and an authorization for Rye Radiology Associates, LLP are annexed hereto.
5. Medical records and an authorization for Westchester Medical Center are annexed hereto.
6. An authorization for Kenneth E. Fox, M.D. is annexed hereto.

C. INFORMATION RELATED TO THE CALCULATION OF DAMAGES:

See Response B.

2A. EXPERT:

Plaintiff may call any of the doctors whose reports and/or records are served by the Plaintiff as expert witnesses at the time of trial. They will testify to the facts and opinions contained in their reports, and the grounds for their opinions are contained in their reports. They will testify that the accident was a substantial contributing cause of the injuries sustained. They will be expected to testify that the injuries will be permanent. Upon retention of any additional expert witnesses, counsel will be notified accordingly.

Dated: White Plains, New York
November 14, 2007

Respectfully submitted,

By: 

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